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January 6, 2023

VIA ECF

Hon. Denise L. Cote, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *SEC v. Joanna Lanni*, Civil No. 22-4736 (DLC)

Dear Judge Cote:

This firm is counsel to Defendant Joanna Lanni ("Ms. Lanni") in the above-referenced matter. On December 22, 2022, Ms. Lanni and Defendant Karen Rosenberger (together, "Defendants") filed a joint letter-motion requesting a sixth-month extension of the fact discovery deadline. (ECF No. 75.) On December 23, the Court denied Defendants' request and ordered Ms. Lanni to provide the SEC with dates for her deposition within seven days of the SEC's noticed date, *i.e.*, by January 19, 2023. (ECF No. 77.) Because Ms. Lanni is currently located in Poland (necessitating her attorneys' foreign travel), and due to scheduling challenges (including a six-hour time difference), the parties have agreed to proceed with Ms. Lanni's deposition on January 24 and 25, 2023, subject to the Court's approval. We therefore respectfully request the Court's permission to conduct Ms. Lanni's deposition on January 24 and 25, 2023. The SEC consents to this request.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Scott B. McBride
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Gravely
Denise Cote
1/6/23

Cc: All counsel of record (via ECF)

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